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9 *Designated solely for service pursuant to LR IA 11-1(b)*

10 *Attorneys for Plaintiff Smart Rain Systems, LLC*

11
12 **UNITED STATES DISTRICT COURT**
13 **IN AND FOR THE DISTRICT OF NEVADA**

14 SMART RAIN SYSTEMS, LLC,

15 Plaintiff,

16 vs.

17 ROHREN – UND PUMPENWERK BAUER
18 GES M.B.H., and BAUER NORTH
AMERICA, INC.,

19 Defendants.

Case No. 2:22-cv-00232-CDS-EJY

20 **JOINT STIPULATION AND ~~PROPOSED~~**
ORDER TO EXTEND THE DEADLINE
TO RESPOND TO THE COMPLAINT
21 **(EIGHTH REQUEST)**

22 IT IS HEREBY STIPULATED AND AGREED, by Plaintiff Smart Rain Systems, LLC
23 (“Smart Rain”), and Defendant Bauer North America, Inc. (“Bauer NA”), Defendant Rohren -
24 und Pumpenwerk Bauer Ges.m.b.H. (“Bauer GmbH”) (collectively, “Bauer”), through their
25 respective counsel, that the time for Bauer to respond to the Complaint be extended up to and
26 including April 14, 2023. Bauer’s current deadline to respond to the Complaint is March 3,
27 2023. Counsel for the parties have been engaging in discussions and recently exchanged
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proposed settlement terms to resolve this matter without the need for further litigation. The parties are considering these terms and anticipate engaging in further negotiations. The additional time stipulated to herein will allow the parties to continue to explore a potential early resolution of the claims in this case.

The reason for the extension is not for purposes of delay or to cause prejudice to any party, but to allow the parties to continue to engage in settlement negotiations. This is the parties' eighth stipulated request for such an extension from the Court, having had previous extensions granted on June 3, 2022 [Docket 17], August 4, 2022 [Docket 19], September 7, 2022 [Docket 21], October 5, 2022 [Docket 25], November 4, 2022 [Docket 29], December 6, 2022 [Docket 31], and January 19, 2023 [Docket 33]. This request complies with Local Rules IA 6-1, IA 6-2, and 7-1.

DATED this 2nd day of March, 2023.

RAY QUINNEY & NEBEKER P.C.

/s/ Z. Ryan Pahnke

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David J. Malley

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ORDER

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

Dated: March 2, 2023